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Evaluation of the Office of the United Nations High Commissioner for Refugees

Report of the Office of Internal Oversight Services

Summary

Global conflicts have resulted in larger and more diverse displaced populations, which reached nearly 58 million worldwide by mid-2015. Since the founding of the Office of the United Nations High Commissioner for Refugees (UNHCR) in 1950, its role has expanded to meet these challenges. While UNHCR has a refugee mandate, it also engages with internally displaced persons, for whom the State has primary responsibility, through an inter-agency framework.

The Office of Internal Oversight Services (OIOS) examined the relevance and effectiveness of the engagement of UNHCR with and for refugees and internally displaced persons in "mixed settings" where both are present, within the overall implementation of its mandate. The evaluation focused on 21 mixed settings, and used surveys, interviews, on-site visits, focus groups, case studies, document reviews and secondary data analyses.

Despite an increase in refugees in more than half of the 21 mixed settings in the past three years, UNHCR provided critical assistance and protection activities, maintaining or increasing the percentage of refugees assisted in most settings. However, challenges remained in reaching out-of-camp refugees. Partners and staff generally rated UNHCR performance positively in most key refugee outcome areas. UNHCR consultation with refugees was also rated largely positively, but was less effective in communicating back to refugees regarding their concerns.

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Through the framework established by the Inter-Agency Standing Committee, the role of UNHCR with regard to internally displaced persons in mixed settings has become more defined. Its decisions to engage with such persons have become more systematic, and its roles in leading coordination clusters are aligned with its perceived organizational strengths. However, within these cluster roles, the specific activities and level of engagement of UNHCR with internally displaced persons have varied at the country level.

Through its internally displaced persons coordination role, UNHCR has made positive contributions to the response to internally displaced persons globally, and a majority of external stakeholders and staff rated UNHCR positively on internally displaced persons coordination in mixed settings. However, variations in performance and complications in coordination were evident at the country level. Factors affecting coordination performance included resources, staff skills and dedicated cluster leads.

On the whole, the role of UNHCR with regard to internally displaced persons within the Inter-Agency Standing Committee system has not affected its broader mandated responsibilities for refugees in mixed settings. In a few cases in which it did, the effects were not entirely negative, and the effect of engagement with internally displaced persons on refugee coordination was also minimal.

As the number of refugees and internally displaced persons has continued to grow, contexts with mixed populations will continue to pose challenges to UNHCR and the humanitarian system as a whole. The present evaluation identified several system-wide issues that require further examination, including implementation of the 2014 joint note of UNHCR and the Office for the Coordination of Humanitarian Affairs on mixed situations.

OIOS makes three important recommendations to UNHCR:

(a) Improve country-level monitoring of out-of-camp refugees;

(b) Ensure consistent communication back to refugees on action taken in response to inputs;

(c) Develop country-specific coordination strategies.

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I. Introduction and objective

1. The Inspection and Evaluation Division of the Office of Internal Oversight Services (OIOS) identified the Office of the United Nations High Commissioner for Refugees (UNHCR) for evaluation on the basis of a risk assessment undertaken by OIOS to identify programme evaluation priorities. The Committee for Programme and Coordination selected the programme evaluation of UNHCR for consideration at its fifty-seventh session, to be held in June 2017 (see A/70/16). The General Assembly endorsed the selection in its resolution 70/8.

2. The general frame of reference for OIOS is set out in General Assembly resolutions 48/218 B, 54/244 and 59/272, as well as the Secretary-General's bulletin on the establishment of OIOS (ST/SGB/273), which authorizes OIOS to initiate, carry out and report on any action that it considers necessary to fulfil its responsibilities. Evaluation by OIOS is provided for in the Regulations and Rules Governing Programme Planning, the Programme Aspects of the Budget, the Monitoring of Implementation and the Methods of Evaluation (see ST/SGB/2016/6, regulation 7.1).

3. The overall objective of the evaluation was to determine, as systematically and objectively as possible, the relevance and effectiveness of UNHCR engagement with and for refugees and internally displaced persons in mixed refugee and internally displaced persons settings, within the overall implementation of its mandate. The evaluation topic emerged from a programme level risk assessment described in the evaluation inception paper.[1] The evaluation has been conducted in conformity with the norms and standards for evaluation in the United Nations system.[2]

4. Comments from the management of UNHCR were sought on the draft report and taken into account in the preparation of the final report. The formal UNHCR response is included in the annex to the present document.

II. Background

A. History and mandate

5. UNHCR was established by the General Assembly in its resolution 319 (IV) of 3 December 1949. Its mandate is defined in its Statute, adopted by the General Assembly in its resolution 428 (V) of 14 December 1950 (annex), as providing international protection to refugees and seeking permanent solutions to refugee problems, and was extended in 2003 "until the refugee problem is solved" (see A/67/6/Rev.1). The General Assembly also expanded the core mandate responsibilities of UNHCR to include stateless people. Furthermore, UNHCR has been invested with specific responsibilities in relation to internally displaced persons within a joint inter-agency approach.

[1] OIOS-Inspection and Evaluation Division inception paper: programme evaluation of the United Nations High Commissioner for Refugees, assignment No. IED-15-004 (26 June 2015).

[2] Issued by the United Nations Evaluation Group in 2005.

6. The overall objective of UNHCR is "to ensure international protection to refugees and others of concern to the Office of UNHCR and to seek permanent solutions to their problems in cooperation with States and other organizations, including through the provision of humanitarian assistance" (see A/67/6/Rev.1). Owing to recent crises, the number of displaced people defined as "of concern" to UNHCR has risen significantly, from 35.8 million in 2012 to 57.9 million in 2015.[3]

7. The primary instruments governing refugee rights and the legal framework underpinning the work of UNHCR are the Convention relating to the Status of Refugees of 1951 and the 1967 Protocol thereto, with 145 and 146 States parties, respectively.[4] For internally displaced persons, national authorities have the primary responsibility to provide protection and humanitarian assistance to displaced persons within their jurisdiction.

B. Structure and governance

8. UNHCR is headed by the High Commissioner, who is responsible for the direction of the organization, and is supported by a Deputy High Commissioner and two Assistant High Commissioners (one each for Operations and Protection).

9. The Office is governed by the General Assembly and Economic and Social Council and reports annually to both bodies. An executive committee, currently comprising 98 States, meets every October and approves the biennial programme and budget.

10. The headquarters of UNHCR are located primarily in Geneva. They comprise the Executive Office, seven Divisions and five regional bureaux (see A/AC.96/1125 and Corr.1), and its field operations are located in 456 locations in 126 countries.[5]

C. Global strategic priorities and results framework

11. The goals of UNHCR are articulated as global strategic priorities in its results framework and include:

(a) Favourable protection environment;

(b) Fair protection processes and documentation;

(c) Security from violence and exploitation;

(d) Basic needs and services;

(e) Community empowerment and self-reliance;

(f) Durable solutions;

(g) Emergency response.

[3] See "UNHCR mid-year trends 2015" (UNHCR, 2015), table 1, final row.
[4] As of April 2015.
[5] See *UNHCR Global Appeal 2016-2017*.

D. Persons of concern

12. The 57.9 million people under the mandate of UNHCR as at mid-2015, referred to as persons of concern, were categorized as follows (see table 1):

(a) Refugees: persons outside their country of origin for reasons of feared persecution or indiscriminate violence, and who require international protection;

(b) Asylum seekers: persons whose applications for asylum or refugee status are pending;

(c) Refugee returnees: persons of concern to UNHCR for a limited period after returning to their country of origin;

(d) Stateless persons: persons not considered nationals by any State;

(e) Internally displaced persons: persons forced to flee their home or place of habitual residence and who have not crossed an internationally recognized State border;

(f) Internally displaced returnees: internally displaced persons protected and/or assisted by UNHCR who have returned to their place of origin.

Table 1
Populations of concern to regional bureaux of the Office of the United Nations High Commissioner for Refugees, 2015

(Millions)

	IDPs protected or assisted by UNHCR[a]	*Refugees and people in refugee-like situations*	*Persons under the statelessness mandate of UNHCR*	*Other populations of concern to UNHCR*[b]
Europe	2.6	3.5	0.6	..
Asia-Pacific	3.0	3.8	1.8	..
Americas	6.5	0.8	0.1	..
Africa	8.7	4.1	1.0	..
Middle East/North Africa	13.3	3.0	0.4	..
Total	**34.0**	**15.1**	**3.9**	**5.0**

Source: "UNHCR mid-year trends 2015".
Note: Total population of concern = 57.9m.
[a] Includes people in situations similar to those of internally displaced persons.
[b] Includes asylum seekers, internally displaced returnees and refugee returnees.

Resources of the Office

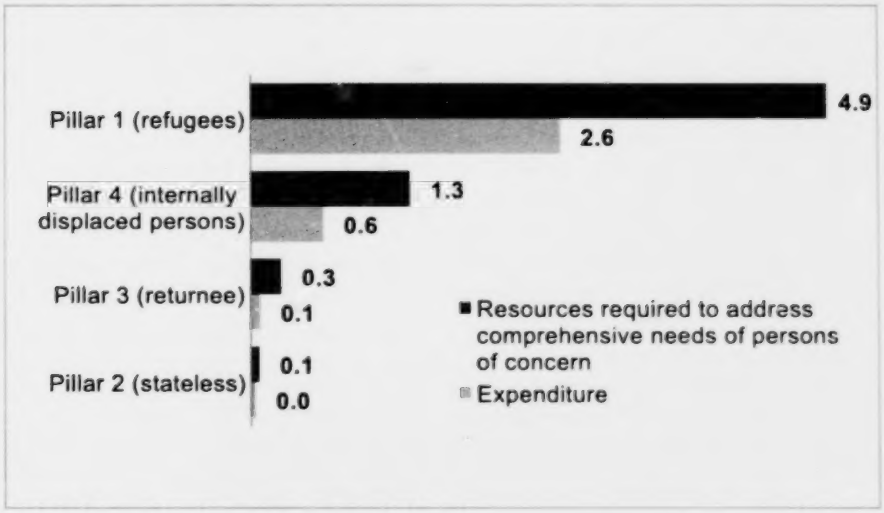
13. In 2014, the overall resources required for implementation of UNHCR activities were $6.6 billion, a 53 per cent increase from 2012. Actual income was $3.6 billion and actual expenditure was $3.4 billion in 2014. Less than 1 per cent of the budget of UNHCR comes from United Nations regular budget contributions; the

remaining 99 per cent is funded by voluntary contributions.[6] In 2015, UNHCR had 9,728 staff, 88 per cent of whom were based in field locations.[7]

14. The budget of UNHCR is divided into four pillars that correspond in part to the key groupings of persons of interest. Figure I shows the 2014 budget for addressing the comprehensive needs of persons of interest, as well as expenditure, by population type. Refugees represent the highest proportion, with 74 per cent of total requirements and 76 per cent of actual expenditure.

Figure I
Final budget and expenditure of the Office, by population type, 2014

(Billions of United States dollars)



Source: UNHCR Global Report 2014.

Engagement of the Office in mixed settings involving both refugees and internally displaced persons

15. In 1993, the General Assembly affirmed its support for UNHCR to provide humanitarian assistance and protection to internally displaced persons, "especially where such efforts could contribute to the prevention or solution of refugee problems". The Assembly defined the foundation for UNHCR engagement with internally displaced persons as being "on the basis of specific requests from the Secretary-General or the competent principal organs of the United Nations and with the consent of the concerned State".[8] It also set out criteria for such efforts, including that they "should not undermine the refugee mandate of the Office and the institution of asylum".[9]

[6] UNHCR, *UNHCR Global Report 2014* (2015), p. 135.
[7] UNHCR, *UNHCR Global Appeal 2016-2017* (2015), p. 2.
[8] See General Assembly resolution 48/116, para. 12.
[9] See General Assembly resolution 69/152, para. 11.

16. In 1991, the General Assembly adopted resolution 46/182, creating an Inter-Agency Standing Committee, with an Emergency Relief Coordinator as Chair. In 2012, the Office for the Coordination of Humanitarian Affairs stated that resolution 46/182 gave the Emergency Relief Coordinator responsibility for "coordinating humanitarian assistance" in complex emergencies. In 2013, UNHCR stated that its own Statute put it "at the centre of the international refugee response system, including in respect of coordination functions". In 2014, responsibilities for both refugees and internally displaced persons overlapped in 14 mixed settings, with simultaneous United Nations responses with regard to both refugees and internally displaced persons. UNHCR and the Office for the Coordination of Humanitarian Affairs attempted to clarify roles and responsibilities in their 2014 joint note on mixed situations and coordination in practice.

III. Methodology

17. The present evaluation examined the work of UNHCR in mixed settings, which involve both refugees and internally displaced persons and are defined as countries that hosted over 10,000 refugees and over 10,000 internally displaced persons concurrently as of 2014, whether or not UNHCR was engaged with the population of internally displaced persons. Twenty-one such mixed settings constituted the evaluation framework: Afghanistan, Bangladesh, Burundi, Cameroon, Chad, the Democratic Republic of the Congo, Ethiopia, India, Iraq, Kenya, Libya, Mali, Nepal, the Niger, Pakistan, Serbia, South Sudan, the Sudan, the Syrian Arab Republic, Uganda and Yemen. They accounted for 41 per cent of the 15 million refugees and 73 per cent of the 34 million internally displaced persons globally, and 48 and 82 per cent of the total expenditure of UNHCR for refugees and internally displaced persons, respectively, in 2014.

18. The present evaluation generally focused on the past three to four years. Its results are based on a triangulation of multiple data sources. The evaluation used the following combination of qualitative and quantitative data-collection methods:

(a) Missions to Geneva, the Democratic Republic of the Congo (Kinshasa, Goma, Bukavu and Uvira), Iraq (Erbil and Dohuk) and Mali (Bamako and Faragouaran), including visits to camps for persons and communities of concern, and direct observation of conditions, communications and UNHCR operations;

(b) A total of 151 semi-structured interviews, at headquarters and in the field, with UNHCR staff, partners, donors, Governments, refugees, internally displaced persons and other stakeholders;

(c) Web-based surveys of a non-random sample of UNHCR professional, substantive headquarters and field staff in the 21 mixed settings;[10] and a non-random sample of United Nations and non-governmental organization (NGO) partners in the 21 mixed settings, comprising operational partners, members of

[10] The staff survey was sent to a non-random sample of 1,407 staff; 398 staff responded (a 28 per cent response rate). Responses from staff in Lebanon and Turkey were dropped from country-level analyses but included for global-level analyses since they were not included in the final selection of 21 mixed settings.

UNHCR-led or co-led clusters, inter-cluster coordinators and humanitarian coordinators;[11]

(d) Thirteen focus group discussions with refugees and internally displaced persons in the Democratic Republic of the Congo, Iraq and Mali;

(e) In-depth case studies of 11 of the 21 mixed settings, using data from interviews, surveys, document reviews and secondary data sources,[12] along with cross-country comparison of results and contributing factors;

(f) Review of a selected sample of key documentation, including operational plans, internal directives and reports, global and operation-level coordination documents, and relevant evaluations;

(g) Analyses of UNHCR programme data, population and budget figures, and operation-level data from the Global Focus database of UNHCR.

19. The collection of data for the evaluation encountered three main limitations: the lack of consistent and comprehensive UNHCR monitoring and performance data, which limited cross-country comparisons; low rates of response to the staff and partner surveys; and identification of several issues related to system-wide coordination structures that were outside the scope of the evaluation.

20. OIOS consulted UNHCR during the conduct of the evaluation and expressed its gratitude for its cooperation and assistance.

IV. Evaluation results

A. The Office provided critical assistance and carried out protection activities for refugees in all mixed settings

21. Despite an increase in the number of refugees in more than half of the 21 mixed settings, UNHCR maintained or increased the percentage of refugees assisted in most of the settings during the past three to four years.

22. At the end of 2014, over 6.1 million refugees were present in 21 mixed settings,[13] reflecting an overall increase of nearly 1 million since 2012. During this three-year period, refugee numbers increased in more than half of the settings (13 out of 21), while remaining at a similar level in six settings and decreasing in two.

23. Responding to that challenge, UNHCR reported assisting a large majority (87 per cent) of the total refugee population in the 21 settings in 2014; the

[11] The partner survey was sent to a non-random sample of 1,362 partner staff; 276 responded (a 20 per cent response rate).

[12] The 11 case studies are of Afghanistan, Cameroon, the Democratic Republic of Congo, Iraq, Libya, Mali, Pakistan, South Sudan, the Sudan, the Syrian Arab Republic and Yemen. They were selected on the basis of (a) UNHCR engagement with internally displaced persons, (b) population and budget size, (c) geographical representation and (d) mix of coordination arrangements and varied displacement flows. Among the 10 mixed settings not selected as case studies are all six in which UNHCR is not engaged with internally displaced persons.

[13] Refugee population figures included in the present report are based on UNHCR data, which reflect some estimation. A 2015 report by Statistics Norway and UNHCR indicated that 23 per cent of refugee population data were either an estimation or a combination of estimation and registration (see E/CN.3/2015/9).

percentage of refugees assisted increased in six settings, remained at a similar level in 12 settings and decreased in three settings. UNHCR assisted between 88 and 100 per cent of refugees in 14 of the 21 settings, and between 61 and 74 per cent in two settings. The remaining five settings with assistance rates under 50 per cent included two settings where the national Government directly assisted certain refugee populations, two settings with widespread active conflicts that significantly limited humanitarian access and one setting with Government restrictions on access to a large refugee population. Table 2 below illustrates numbers and trends for refugee populations and UNHCR assistance, by mixed setting, over the past three years.

Table 2
Refugee numbers, trends and assistance provided by the Office in 21 mixed settings, 2012-2014

		Population (in thousands)		*Population assisted by UNHCR (percentage)*	
UNHCR engagement	*Operation*	*2014*	*Trend*	*2014*	*Trend*
Refugees and internally displaced persons	Afghanistan	300	↗	100	→
	Cameroon	264	↗	94	→
	Chad	453	↗	100	↗
	Iraq	271	↗	100	→
	Libya	28	↗	100[a]	→
	Niger	78	↗	100	→
	South Sudan	248	↗	100	→
	Syria	149	↘	17	→
	Yemen	258	↗	46	↘
	Burundi	53	↗	100	→
	Mali	15	→	100	↗
	Pakistan	1 506	→	100	→
	Serbia	44	→	18	↗
	Democratic Republic of the Congo	120	↗	74	↗
	Sudan	278	↗	88	↗
Refugees only	Bangladesh	232	→	14	↘
	Ethiopia	660	↗	100	→
	India	200	→	13	↗
	Kenya	551	→	100	→
	Nepal	38	↘	61	↘
	Uganda	386	↗	100	→
Total		**6 132**	↗	**87**	

Source: UNHCR "Global trends" and "Mid-year trends" publications.
[a] Based on mid-2015 data.

24. In 2014, 52 per cent of refugees in the 21 settings resided outside camps. UNHCR developed a policy of pursuing alternatives to camps, an acknowledgement that living in communities can provide greater opportunities for resilience, independence and normality.[14] While UNHCR has started to collect information on the implementation of this policy,[15] comprehensive, disaggregated data on UNHCR assistance to out-of-camp refugees are not available. Field visits illustrated challenges regarding coverage of non-camp refugees. In two settings visited where a majority of refugees resided outside camps, several partners and staff interviewed expressed the view that UNHCR assistance to non-camp refugees was a weakness; in one, UNHCR assistance was focused primarily on in-camp refugees, owing to access issues and funding shortages, while in the other, data from direct observation and focus groups indicated that refugees outside the camp had less reliable access to basic services than those who were in the camp.[16]

With the exception of achievement of durable solutions, partners and staff generally rated the performance of the Office positively

25. The four key refugee outcomes, as defined for the present evaluation, are:

(a) Safety from persecution and violence;

(b) Mitigation of other protection risks;

(c) Meeting of basic needs;

(d) Achievement of durable solutions.

26. As shown in figure II, partners and staff surveyed in all 21 settings had positive perspectives on the performance of UNHCR in protection. Protection work was also cited most frequently as the main success of UNHCR in the past three to four years by both partners and staff interviewed in field locations.

27. When rating the performance of UNHCR in meeting the basic needs of refugees, 57 per cent of partners said it was good or excellent, compared with 49 per cent of staff. Only one third of partners and staff surveyed had positive opinions of the performance of UNHCR with regard to durable solutions, in acknowledgement of the external challenges raised in the 2014-2015 OIOS evaluation of UNHCR (E/AC.51/2015/5).

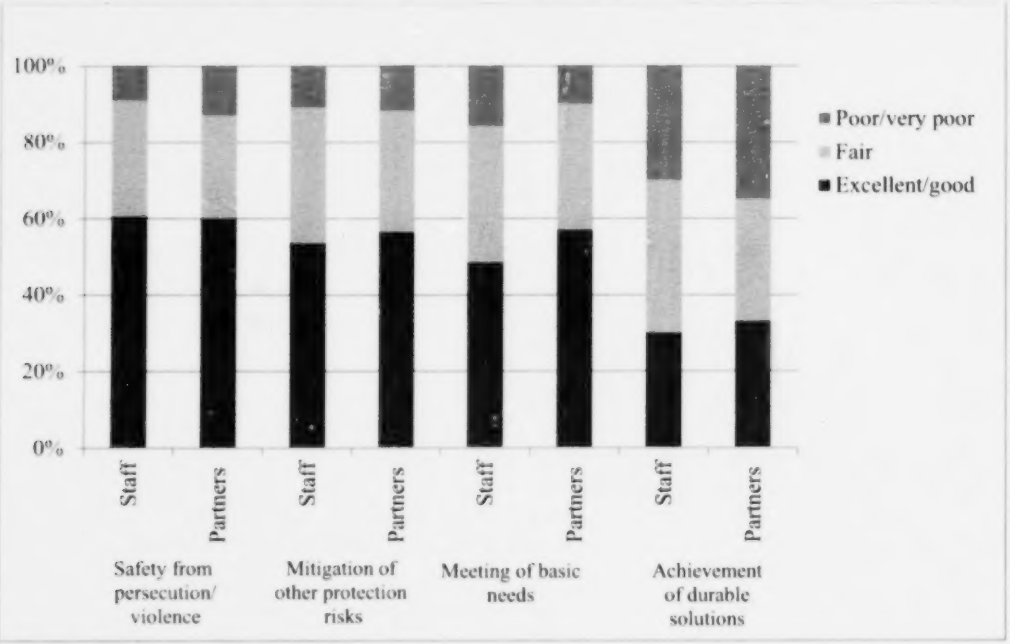
[14] See UNHCR, "UNHCR policy on alternatives to camps" (2014).

[15] See "UNHCR diagnostic tool for alternatives to camps: 2015 global results".

[16] In the third setting visited, all refugees were out of camp.

Figure II

Partner and staff ratings of the performance of the Office were largely similar



Source: OIOS staff and partner surveys.

Staff also reported that refugee outcomes had improved in two thirds of mixed settings

28. Staff in the 21 settings were surveyed for their perspectives on trends relating to each of the four key refugee outcomes, as influenced by both UNHCR performance and external factors. In 14 settings, staff noted positive trends over the past three to four years in at least three of the four refugee outcomes. The remaining seven settings, where staff did not report improvements, were characterized by severe operational challenges, including a high degree of insecurity and inaccessibility of refugee populations, political instability and/or restrictions by the host Government.

29. With regard to each outcome area, staff in 14 of the 21 settings reported that safety from persecution/violence and mitigation of other protection risks had improved in the past three to four years. Similarly, staff in 14 of the 21 settings reported that meeting basic needs had also improved. In relation to achievement of durable solutions for refugees, staff in 15 of the 21 settings reported that those outcomes had improved.

With respect to implementing participatory processes, consultation by the Office with refugees was generally good in the 21 mixed settings, despite challenges in managing the expectations of refugees

30. Operations of UNHCR are required to conduct participatory needs assessments to inform programme design and resource allocation in line with the age, gender and diversity approach and the accountability-to-affected-populations approach.[17] UNHCR has generally performed well in this regard. A review of 2014 reports on age, gender and diversity in the 21 mixed settings found that 19 of the settings had conducted formal participatory assessments using the age, gender and diversity approach, and that all of them reported having incorporated findings from the assessments in planning and programming for 2015. Participatory approaches varied across operations, including semi-structured dialogues with refugee women and men from different age groups in a few selected camps and consultations with refugees in both camp and non-camp settings. One operation focused its formal exercise on returnees and internally displaced persons. The two settings in which a formal exercise was not conducted were faced with significant security challenges in their countries of operation; one nevertheless reported promoting more informal participation by persons of concern in the planning process.

31. Forty-two per cent of field-based partners interviewed also expressed positive views on communications by UNHCR with persons of concern, compared with 15 per cent who said improvement was needed. In addition, a majority of field staff interviewed (70 per cent) expressed positive views on UNHCR communications with persons of concern, citing the participatory needs assessment and the age, gender and diversity approach, as well as other forms of regular communication, while 28 per cent said that it needed improvement. Field staff interviewed reported regularly using feedback from persons of concern to inform planning and programming. In at least four settings, including two visited by OIOS, UNHCR had moved to cash assistance programming for some refugee communities in response to input from persons of concern. In addition, OIOS observed a variety of channels through which refugees could express their needs directly or through implementing partners, including regular interactions with refugee committees selected for age and gender diversity.

32. Nevertheless, field visits revealed challenges faced by UNHCR and its partners in managing the expectations of persons of concern and in closing the feedback loop by communicating decisions made in response to their concerns. In focus groups conducted in the three missions visited, participating refugees expressed a high degree of dissatisfaction with the level of assistance provided by UNHCR and almost unanimously demanded far greater assistance from UNHCR. They also expressed frustration regarding the extent of their communications with UNHCR. Several partners and staff interviewed acknowledged that funding constraints might not have been adequately communicated to the target communities.

[17] See UNHCR, "Age, gender and diversity policy: working with people and communities for equality and protection".

B. The role of the Office with regard to internally displaced persons in mixed settings has become more defined, but its level of engagement remains variable

The parameters of engagement of the Office with internally displaced persons have become clearer through the cluster system

33. Unlike its clearly defined role and accountability with regard to refugees, the role of UNHCR with regard to internally displaced persons has varied over the past four decades. From the 1970s to the 1990s, decisions by UNHCR to engage with internally displaced persons were made on a case-by-case basis, according to General Assembly criteria, and at the discretion of UNHCR management. There was also variation in the sectors in which UNHCR engaged with internally displaced persons, including, for example, food, health and education.[18]

34. Nevertheless, UNHCR engagement with internally displaced persons now largely falls within the framework defined by the Inter-Agency Standing Committee cluster system, introduced in 2005 and further articulated under the Transformative Agenda in 2011.[19] Under this framework, the Inter-Agency Standing Committee has assigned global cluster coordination leadership responsibilities to participating humanitarian agencies. UNHCR leads the global protection cluster and co-leads the clusters on (a) camp coordination and camp management and (b) emergency shelter and non-food items. Country-level clusters are activated on the basis of the needs and a set of criteria agreed through the Committee.

35. As a result, decisions by UNHCR to engage in situations involving internally displaced persons have become more systematic. This was reflected in headquarters staff interviews, during which the role of UNHCR in the Inter-Agency Standing Committee was most commonly cited as the main reason for UNHCR engagement. Nearly one third of headquarters staff who were interviewed also volunteered resource availability as a factor for engagement, as UNHCR funding of activities relating to internally displaced persons was project-based and earmarked for that population under its pillar budget structure. UNHCR has worked to clarify and further consolidate the legal basis and principles for engagement with internally displaced persons, most recently through issuance of a guidance note in 2014. It has stated that the intention for engagement with internally displaced persons is to "reinforce the complementarities and synergies between the work of UNHCR with refugees and the internally displaced".[20] In that guidance, UNHCR identified priority interventions with regard to internally displaced persons in line with its

[18] See "UNHCR's operational experience with internally displaced persons" (UNHCR, 1994); and "The protection of internally displaced persons and the role of UNHCR" (UNHCR, 2007).

[19] Transformative agenda actions are articulated in the Inter-Agency Standing Committee's 2012 chapeau and compendium document and in protocols developed between 2013 and 2015. "Clusters" are coordination bodies designated by that Committee, made up of humanitarian organizations in the main sectors of humanitarian action. "Sectors" have similar functions but generally fall outside Committee frameworks and, for refugee response, are led by UNHCR.

[20] See UNHCR, "UNHCR's engagement in situations of internal displacement: provisional guidance" (March 2014).

cluster commitments and results framework, which have become known as the "internally displaced persons footprint".[21]

36. Staff also reported that the clarity of the role of UNHCR with regard to internally displaced persons had improved. All headquarters staff interviewed who were asked about clarity said that the role had become clearer, although a few said that further improvements were needed. Most staff survey respondents reported that the role of UNHCR with regard to internally displaced persons globally had either become clearer or stayed the same in the past three to four years (43 and 37 per cent, respectively). Nineteen per cent, the bulk of whom were from 6 of the 21 settings, believed that it had become less clear.

There is broad alignment between the cluster leadership roles of the Office in response to internally displaced persons and its organizational strengths

37. The cluster leadership roles of UNHCR correspond to its comparative advantages. In particular, UNHCR leadership of the global protection cluster and of country-level protection clusters aligns with the fact that protection expertise was the most commonly cited unique value of UNHCR, as volunteered by one third of all partners and staff interviewed. The second and third most volunteered areas of valued added by UNHCR, by all interview respondents, were its emergency response capacity and its technical expertise in areas such as shelter and camp management. Partner survey respondents also most frequently mentioned UNHCR coordination and/or partnerships, and protection expertise and capacity, as its unique strengths in working with internally displaced persons.

38. Sixty-eight per cent of partners surveyed said that UNHCR was playing the right role overall with internally displaced persons. Those who did not think that UNHCR was playing the right role focused on deficiencies in coordination and insufficient engagement with internally displaced persons — indicating that negative responses were related more to the performance of UNHCR than to its role.

The Office's leadership arrangements and expenditure for internally displaced persons in mixed settings have broadly fallen within its defined cluster responsibilities and organizational objectives

39. UNHCR country-level leadership arrangements generally reflect its global coordination roles. As shown in figure III, UNHCR leads or co-leads the protection cluster or sector in all 11 case studies. It leads or co-leads the cluster on shelter and non-food items in 8 of 10 cases in which the cluster is active and leads or co-leads camp coordination and camp management in all seven cases in which the cluster is active. In 2 of the 11 cases, the engagement of UNHCR goes beyond these three clusters in response to local needs and its own capacity: it co-leads the return, recovery and reintegration sector in the Sudan and the cash working group in Iraq.

[21] UNHCR subsequently issued the Operational Guidelines for UNHCR's Engagement in Situations of Internal Displacement in January 2016.

Figure III

The role of the Office in national-level response coordination mechanisms relating to internally displaced persons in mixed settings largely corresponded to its global roles

	Protection	Shelter	Non-food items	Camp coordination and camp management	Other
Afghanistan	Cluster co-lead	Cluster co-lead		N/A	Multisector lead
Cameroon	Sector co-lead	N/A			Multisector lead
Democratic Republic of the Congo	Cluster lead	[illegible]		Working group co-lead	
Iraq	Cluster co-lead	Cluster co-lead		Cluster co-lead	Cash working group lead
Libya	Sector lead	Sector lead		N/A	
Mali	Cluster lead	Cluster lead			
Pakistan	Cluster lead	Cluster lead		Cluster lead	
South Sudan	Cluster co-lead	[illegible]		Cluster co-lead	
Sudan	Sector lead	Sector lead		N/A	Return, reintegration and recovery co-lead
Syrian Arab Republic	Sector lead	Sector co-lead		Sector lead	
Yemen	Cluster lead	Cluster lead			

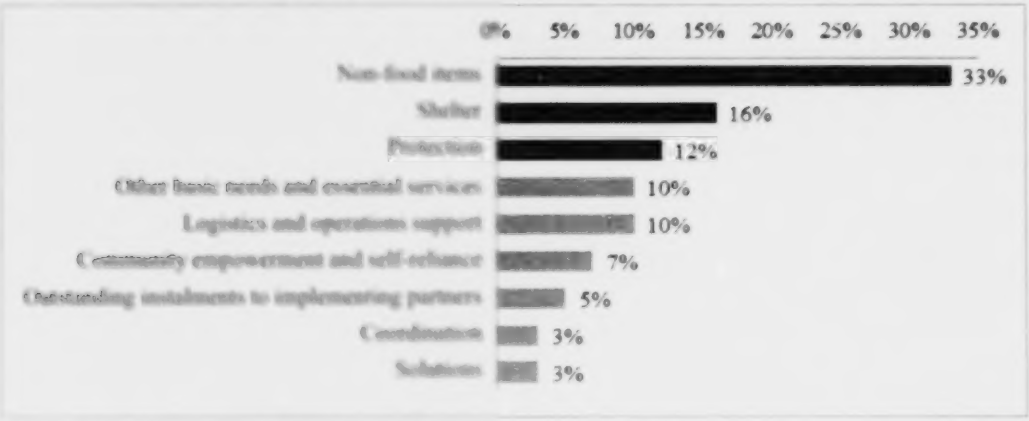
Source: OIOS compilation of interviews, humanitarian response plans and country-level coordination documents.
Abbreviations: N/A, not applicable.

40. Spending figures with regard to internally displaced persons, broken down by sector, also reflect the focus of UNHCR on its cluster area responsibilities in mixed settings. As figure IV shows, the three sectors with the highest expenditure during the period 2012-2014 were non-food items (33 per cent of total spending on internally displaced persons), shelter (16 per cent) and protection (12 per cent), which aligns with its three cluster lead responsibilities. The additional spending categories, including coordination, may also have cluster-related spending.

Figure IV

Spending by the Office on internally displaced persons, by sector, in 21 mixed settings[a] between 2012-2014 was concentrated in its cluster leadership areas

(Sector as a percentage of total internally displaced persons expenditure)



Source: UNHCR Management Systems Renewal Project data.

[a] Includes expenditure for operations in 21 mixed settings: Afghanistan, Bangladesh, Burundi, Cameroon, Chad, the Democratic Republic of the Congo, Ethiopia, India, Iraq, Kenya, Libya, Mali, Nepal, the Niger, Pakistan, Serbia, South Sudan, the Sudan (including the Sudan common humanitarian pipeline), the Syrian Arab Republic (including the office of the regional refugee coordinator for Syrian refugees in Amman), Uganda and Yemen.

However, within its cluster roles, the specific activities and level of involvement of the Office with internally displaced persons have varied at the country level

41. Analysis of the "internally displaced persons footprint" reveals that the activities of UNHCR with regard to internally displaced persons broadly fall within its cluster areas. UNHCR analysed 2016 country-level plans according to the priority interventions articulated in its 2014 guidance note on engagement with internally displaced persons. Seven of the 21 mixed settings had completed the footprint dashboard exercise; in those seven settings, 80 per cent of activities relating to internally displaced persons had fallen within the footprint. For the 20 per cent of activities that fell outside the footprint, about half were still within cluster areas but outside the determined priority areas of UNHCR.[22]

42. Nevertheless, within these broad cluster areas, the 11 country case studies showed significant variation in the specific activities relating to internally displaced persons that had been undertaken by UNHCR. This is appropriate when done in response to the needs of the local context, which was the case in some settings; in others, variations were more problematic. In one setting with significant protection concerns, protection coordination activities were limited largely to convening meetings and coordinating protection monitoring, whereas in other settings this function encompassed thorough needs assessments, 3/4 W mapping[23] and

[22] OIOS analysis based on seven country-level footprint dashboards concerning internally displaced persons (UNHCR, 2015).

[23] 3W means "who, what, where" mapping of cluster member activities; 4W includes "when."

fundraising to fill assistance gaps. Furthermore, the cross-cutting nature of protection has lent itself to varied interpretations of what constitutes protection interventions. The comprehensive nature of camp coordination and camp management and shelter has also highlighted the interconnected nature of the clusters that UNHCR leads or co-leads. For example, in one context, shelter cluster members expressed frustration with lack of progress in the water, sanitation and hygiene cluster, which had led to delays in shelter activities and discussions on whether UNHCR should be involved in the provision of water, sanitation and hygiene. Although the global clusters provide guidance and terms of reference for coordinators,[24] actual application in the field can be inconsistent — an issue noted by some staff and partners interviewed in 5 of the 11 case studies.

C. Through its coordination role, the Office has made positive contributions to response to internally displaced persons in mixed settings, despite some complications at the country level

A majority of external stakeholders and staff rated the Office positively on coordination with regard to internally displaced persons in mixed settings, although variations in performance were evident at the country level

43. Although Governments have the primary responsibility for assisting and protecting internally displaced persons, the humanitarian system plays a key role in crisis response when the capacities of Governments are inadequate or when Governments are contributors to the crisis. Unlike its accountability for refugees, UNHCR is a contributor to a collective response with regard to internally displaced persons. Assessing this contribution thus requires focusing on its coordination role and operational activities.

44. A majority of UNHCR partners surveyed rated its coordination performance with regard to internally displaced persons positively. Sixty-one per cent said that the contributions of UNHCR had contributed to better results achieved for internally displaced persons in their countries of operation, and most also rated its performance positively in several key areas, as shown in table 3.

Table 3
Partner ratings of UNHCR partnerships were largely positive

Partnership area	*Excellent or good rating (percentage)*
Partner's overall partnership with UNHCR	63
UNHCR understanding of partner work and expertise	65
UNHCR information-sharing with partners	66
UNHCR contribution to the coordinated planning of activities related to internally displaced persons	67
UNHCR consultations with partners on changes to its response to internally displaced persons	70

Source: OIOS partner survey.

[24] Global protection cluster terms of reference, camp coordination and camp management toolkit and shelter coordinator toolkit.

45. Among staff surveyed, a small majority rated UNHCR positively in its coordination of protection work, shelter, and camp coordination and camp management (58, 54 and 53 per cent respectively) but noted that there was room for improvement in "mitigating other protection risks for internally displaced persons", with 58 per cent rating UNHCR coordination performance in that area as poor.

46. Field-based partners and staff interviewed had similar views of UNHCR partnerships relating to response to internally displaced persons, with most stating that it was positive overall — three times more than those who said it was negative. They most frequently noted the leadership of UNHCR of the protection cluster and information-sharing as strengths. However, reflecting the varied nature of partner perspectives, field-based partners interviewed also most commonly cited UNHCR leadership of the protection cluster as a weakness.

47. In 6 of the 11 case studies, UNHCR performance relating to coordination of internally displaced persons worked well overall. Nevertheless, partners and staff reported performance variations over time, among sectors or within the country. In one case, while several interviewees noted effective coordination at the capital level, others in a field location expressed frustrations with UNHCR protection coordination, particularly in information-sharing. In another case that headquarters interviewees perceived as problematic, field-level interviews reported a high degree of functionality of clusters led or co-led by UNHCR at the working level, despite initial problems.

48. In protection coordination in particular, an independent whole-of-system review of protection noted mixed results. While the review encompassed both mixed and non-mixed settings, it found inconsistent performance in protection clusters, stating that "The performance of the protection clusters can vary significantly, both within a country and also across different contexts … In some contexts, the protection cluster is where strategies are developed; in others, it operates primarily as an information-sharing platform and [is] not where strategic decisions are made".[25]

49. As with refugees, UNHCR engagement with internally displaced persons was stronger with camp-based populations, although the vast majority of internally displaced persons do not reside in camps.[26] One of the areas it co-leads (camp coordination and camp management) relates mostly to camps. The amount of shelter work undertaken outside camps is difficult to quantify, as consistent data on assistance to out-of-camp internally displaced persons are unavailable. A 2013 study by the Brookings Institution noted that data on non-camp populations of internally displaced persons are inadequate, complicating assistance delivery.[27] Lower levels of assistance to out-of-camp populations were also observed during two of the three field missions, and noted during focus group discussions with internally displaced persons in these locations. Whereas in some case studies, access to national systems

[25] See Norah Niland and others, "Independent whole of system review of protection in the context of humanitarian action" (Norwegian Refugee Council, 2015), chap. 7.2.

[26] UNHCR does not officially estimate populations of out-of-camp internally displaced persons, but OIOS calculations based on data from "UNHCR global trends: forced displacement in 2014" estimate that approximately 99 per cent of non-refugee persons resided outside camps in 2014.

[27] See "Under the radar: internally displaced persons in non-camp settings" (Brookings-LSE Project on Internal Displacement, 2013).

meant that less outside assistance was required, in others there were significant assistance gaps for internally displaced persons, either in sectors such as shelter or in geographical areas with limited humanitarian access.

Tensions with partners were present in some settings with refugees and internally displaced persons in the same geographic area

50. There is some lack of clarity regarding which entity should play the lead agency role for refugees in mixed settings where refugees and internally displaced persons are in the same geographic area, which has led to some complications in coordination. In 2014, UNHCR and the Office for the Coordination of Humanitarian Affairs signed the joint note on mixed situations and coordination in practice to "simplify and streamline leadership and coordination arrangements in a complex emergency or natural disaster where a Humanitarian Coordinator has been appointed, and a UNHCR-led refugee operation is also under way". The agreement stipulates that "where refugees are present in the same geographic area as internally displaced persons", operational coordination and delivery for both populations should be merged into a single structure under either UNHCR sectors or Inter-Agency Standing Committee clusters, but does not specify which should apply in any given case. The Emergency Relief Coordinator is mandated to coordinate with humanitarian partners "in full respect of their mandates", meaning that solutions should not be unilaterally imposed by the Emergency Relief Coordinator.[28]

51. Throughout all six case studies involving refugees and internally displaced persons in the same geographic area, UNHCR retained the lead agency role for refugees and chose to maintain separate, parallel refugee coordination arrangements in four of the six case studies. Its fundraising for refugees also remained largely separate.[29] Some humanitarian partners perceived the autonomous approach of UNHCR to refugee coordination as uncompromising, leading to tensions with contiguous populations in three of the cases studied. Moreover, partners and staff in some cases noted inefficiencies caused by parallel fundraising and reporting processes between UNHCR and the Inter-Agency Standing Committee. In another case, cooperation with partners was hindered by a disagreement over whether sectors or clusters should apply to refugee response.

Factors that contributed to good coordination by the Office in mixed settings included adequate resources, staff skills and dedicated cluster leads

52. Three factors were most commonly noted by partners and staff interviewed at headquarters and in the field as contributing to well-functioning coordination. Field-based respondents most frequently cited the level and availability of coordination resources as the main factor contributing to better coordination. The second most commonly cited factor was the existence of the right skill set. In all three field missions, as well as in four other country cases, ratings of the coordination performance of UNHCR were attributed at least in part to specific coordinators and

[28] See General Assembly resolution 46/182.

[29] Appeals for refugees by UNHCR fed into independently budgeted global appeals. These were included in annual Inter-Agency Standing Committee joint appeals in 11 case studies, but in 10 of those UNHCR maintained a separate chapter for refugees. UNHCR is authorized by ExCom to raise funds independently (see www.unhcr.org/3ae69ef30.html).

their skills in leading and facilitating cluster goals. The UNHCR learning centre has developed a course on coordination, although only about 60 per cent of current coordinators have attended it. High turnover has also made it challenging to consistently deploy staff with strong coordination skills. The third factor, related to resources, was a dedicated cluster coordinator. In 5 of the 11 case studies, interviewees noted improvements in coordination with the appointment of dedicated cluster coordinators, rather than "double-hatted" cluster coordinators who also held roles and responsibilities within the UNHCR country office. Several partners and staff involved in coordination in those contexts also noted that having dedicated cluster roles reduced perceived or actual conflicts of interest between representing UNHCR and representing cluster needs.

D. On the whole, involvement of the Office with internally displaced persons has not negatively affected its refugee work in mixed settings

53. The General Assembly emphasized that the work of UNHCR related to internally displaced persons "should not undermine the refugee mandate of the Office". OIOS assessed whether involvement with internally displaced persons had negatively affected the refugee work of UNCHR, specifically its ability to facilitate protection of and provide assistance to refugees and to effectively coordinate refugee responses.

Involvement of the Office with internally displaced persons in mixed settings has largely had no discernible effect on its refugee protection and assistance work

54. For the most part, the involvement of UNHCR with internally displaced persons in mixed settings did not appear to affect its refugee protection and assistance work. Globally, one third of external stakeholders interviewed claimed that there was no overall impact of that work on the refugee mandate of UNHCR, with some stating that this was a result of the prioritization by UNHCR of refugees. Among UNHCR staff surveyed about mixed settings where they had most recently worked, 48 per cent claimed UNHCR involvement with internally displaced persons had had no overall impact on its ability to achieve refugee protection/assistance outcomes in the past three to four years. In 7 of the 11 case studies, OIOS assessments found no evidence that involvement with internally displaced persons in recent years had had an impact on the ability of UNHCR to facilitate refugee protection or provide refugee assistance. Among these seven case studies, responses to either refugees or internally displaced persons were geographically distinct (operating independently with mostly separate financing), or refugees were categorically prioritized by UNHCR.

Involvement of the Office with internally displaced persons affected its refugee work in some cases, although the effects were not entirely negative

55. In 4 of 11 case studies, evidence indicated that the involvement of UNHCR with internally displaced persons had affected its refugee work. In one case, negative perceptions by the Government of the protection activities of UNHCR with regard to internally displaced persons, and the resulting restrictions on its field presence, had adversely affected its ability to respond effectively to a refugee

emergency. In the three other cases, influxes of internally displaced persons had created resource trade-offs that had constrained refugee operations. Overall, resource trade-offs were the effect on refugee work of responses to internally displaced persons that was most cited by interviewed staff. In these three cases, the number of internally displaced persons protected and assisted by UNHCR more than tripled between 2013 and 2014, from 1.9 million to 6.5 million, and spending rose from $68 million to $263 million. Meanwhile, UNHCR spending on refugee activities in those operations declined by a quarter, to $239 million, from 2013 to 2014, despite an increase in the number of refugees receiving assistance. These implied reductions in spending per refugee included cuts of between 21 and 57 per cent to basic needs and essential services, mainly in the provision of shelter and non-food items.[30] Nevertheless, in all three, refugee operations had been established for more than two years, which limited the relative impact of 2014 spending cuts.

56. Nevertheless, in these three case studies, assistance to internally displaced persons also enhanced refugee protection. In two cases, staff noted that narrowing the gap between UNHCR assistance to refugees and to internally displaced persons had helped reduce threats to refugees from inter-group tensions resulting from perceived disparities in assistance between the two groups.[31] In the third case, assistance provided by UNHCR to internally displaced persons had had a positive impact on refugee protection, by improving the relevance of UNHCR to the host Government and enabling it to successfully advocate enhanced refugee protection space.

Involvement of the Office with internally displaced persons had a minimal negative effect on its coordination of refugee responses in mixed settings

57. UNHCR coordination of refugee responses in mixed settings has been largely effective. Most operating partners surveyed (65 per cent) rated its coordination of refugee activities in mixed situations as good or excellent, compared with 14 per cent who rated it as poor or very poor. This overall ratio was mirrored in 10 of the 14 mixed settings where UNHCR is involved with both refugees and internally displaced persons. Moreover, in 7 of the 11 case studies, operating partners and UNHCR staff reported consistently unproblematic refugee coordination. The other four case studies contained episodes of problematic coordination that were usually confined to initial phases of the refugee response and had mostly been resolved at the time of data collection.[32]

58. Two key underlying factors supported UNHCR in effectively coordinating refugee responses: the clarity of its mandate and its ability to mobilize resources for refugees. Drawing on its mandate, UNHCR acted as lead agency for refugee responses in all 11 case studies. The needs-based approach of UNHCR to planning and budgeting[33] also helped to ensure the financing of refugee responses throughout

[30] Basic needs and essential services include water, shelter, food, water, sanitation and hygiene, health care, non-food items, energy and education.

[31] This risk was noted by staff in five out of six case studies with contiguous populations of refugees and internally displaced persons.

[32] These included the failure of UNHCR to lead technical sectors effectively, confusion about roles and leadership constraints resulting from a lack of direct access to refugee locations. In all four cases, initial delivery of refugee assistance was adversely affected.

[33] Started in 2010.

the cases studied. This contrasts with the resource-based approach used in consolidated appeals processes for all United Nations planning and budgeting for internally displaced persons.

V. Conclusion

59. As the number of refugees and internally displaced persons has continued to grow, contexts with mixed flows of refugees and internally displaced persons will continue to pose challenges to UNHCR and the humanitarian system as a whole. UNHCR has retained its primary responsibility for refugees in accordance with its mandate, while contributing to response to internally displaced persons through coordination roles aligned with its core organizational strengths. Its more focused engagement with internally displaced persons has not had a negative impact on its ability to deliver on its core refugee mandate.

60. The interconnected nature of this system means that the results identified in the present evaluation have system-wide implications, a point raised frequently by evaluation respondents. As internally displaced persons are nationals of their State, humanitarian agencies cannot assume or adopt accountability in the same way that UNHCR has accountability for refugees. This lack of accountability is problematic when clusters assume responsibility for delivering in accordance with a humanitarian response plan. The Inter-Agency Standing Committee has attempted to address this through its efforts relating to accountability to affected populations and by assigning "provider of last resort" functions to cluster lead agencies, which are defined as follows:

> Depending on access, security and availability of funding, the cluster lead ... must be ready to ensure the provision of services required to fulfil crucial gaps identified by the cluster and reflected in the Humanitarian Response Plan [led by the Humanitarian Coordinator].[34]

61. The Inter-Agency Standing Committee recognizes that even this level of accountability is more complex, with cross-cutting sectors such as protection and camp coordination and camp management, and notes that "sector leads are responsible for ensuring that wherever there are significant gaps in the humanitarian response they continue advocacy efforts and explain the constraints to stakeholders".[35]

62. The marked contrast between the clear mandate and responsibility of UNHCR for refugees versus a system in which there is no clear non-State responsibility for internally displaced persons lies at the heart of the tensions and varied effectiveness in some mixed settings. UNHCR defends its prioritization of refugees owing to its mandate and notes that refugee status itself is a vulnerability and protection risk that internally displaced persons do not face. However in some contexts, internally displaced persons increasingly face protection risks similar to those faced by refugees, who at times occupy the same geographical areas.

[34] See "Reference module for cluster coordination at country level" (Inter-Agency Standing Committee, 2015), sect. 3.

[35] See guidance note on using the cluster approach to strengthen humanitarian response (Inter-Agency Standing Committee, 2006).

63. The present evaluation identified several system-wide issues beyond the scope of the evaluation that require further examination. Among them are the application of the joint note, including factors determining which agency will lead merged coordination structures, and analysis of whether merged or parallel structures result in better outcomes for persons of concern. Agreements on responsibility for data collection and population estimates of internally displaced persons also require system-wide reflection, as do discussions on budget approaches. As needs-based budgets have enabled UNHCR to gain a more comprehensive picture of refugee needs, inter-agency discussions on whether to systematically adopt similar budget systems for internally displaced persons may lead to more harmonized approaches. A more comprehensive system-wide humanitarian response will become more critical as population numbers and access constraints increase.

64. UNHCR can make adjustments to improve its contributions and to advocate with partners for more effective coordination, but it is one player in a much larger system that comprises other United Nations agencies, international and local NGOs, donors, States and persons of concern. Ensuring that the needs and inputs of affected populations are incorporated into planning and response on a broad-based level will be the main challenge for all contributing partners, but one in which UNHCR, with its global leadership and expertise in displacement, can play a guiding role.

VI. Recommendations

65. OIOS makes three important recommendations to UNHCR.

Recommendation 1 (result A)

66. Within and between mixed settings, there are differences in the extent and quality of data collected, particularly between refugees in camps and those outside camps. **To address this, UNHCR should improve country-level monitoring through strengthening efforts to collect data on out-of-camp refugees, including on assistance provided by UNHCR.**

Recommendation 2 (result A)

67. In line with the policy objective of accountability to affected populations, UNHCR should do more to close the feedback loop and involve persons of concern more substantively in decision-making. Recognizing the challenges in promoting meaningful participation that manages expectations and is not resource intensive, **UNHCR should systematize efforts to communicate back to refugees on what was done with their inputs by consistently and regularly integrating reviews and consultations on the results of the prior-year assessments concerning the age, gender and diversity mainstreaming strategy, and what decisions were made on the basis of them and why, at the start of each annual participatory assessment.**

Recommendation 3 (results B and C)

68. To ensure that coordination more effectively and efficiently facilitates the response to the needs of internally displaced persons and refugees, **UNHCR should**

develop country-specific coordination strategies, outlining incorporation of regional coordination mechanisms and/or joint note provisions, where appropriate, and possibly including:

(a) The decision and rationale for separate or combined coordination structures;

(b) Strategies for clusters led or co-led by UNHCR that reflect global cluster norms and standards while responding to the realities of each context;

(c) Tailored national- and local-level terms of reference for refugee, cluster and sector coordinators;

(d) The appointment of an NGO co-lead for the protection cluster, as appropriate;

(e) Contribution to the formulation of humanitarian country team priorities with regard to internally displaced persons and subsequent consideration of those priorities in coordination;

(f) Plans for data collection and joint needs assessments.

(*Signed*) Heidi **Mendoza**
Under-Secretary-General for Internal Oversight Services
12 January 2017

Annex

Memorandum dated 5 April 2016 from the Policy Development and Evaluation Service of the Office of the United Nations High Commissioner for Refugees addressed to the Inspection and Evaluation Division of the Office of Internal Oversight Services

The Office of Internal Oversight Services (OIOS) presents below the full text of comments received from the Office of the United Nations High Commissioner for Refugees (UNHCR) on its evaluation. This practice has been instituted in line with General Assembly resolution 64/263, following the recommendation of the Independent Audit Advisory Committee.

Comments of the Office of the United Nations High Commissioner for Refugees on its evaluation

1. In response to your memorandum of 23 March 2016 addressed to High Commissioner Grandi on the programme evaluation of the United Nations High Commissioner for Refugees, I outline below the main observations of UNHCR on the formal draft evaluation report. Before doing so, I would like to record the satisfaction of UNHCR with the willingness of the OIOS evaluation team to engage in an open and constructive dialogue with both our headquarters- and field-based colleagues throughout the process. This has contributed significantly to the insights generated during the evaluation and to the quality of the draft report.

2. As has been widely recognized in recent years, the humanitarian system has come under considerable pressure. The substantial increase in the number of forcibly displaced persons, both refugees and internally displaced persons, many of them caught in protracted situations, has presented a sharp challenge for the international community. The provision of protection and assistance has often been constrained by issues of rising insecurity, violence and restricted access to affected populations. Notwithstanding the substantial increase in funding overall, financial resources have not kept pace with the level of global humanitarian needs.

3. The forthcoming World Humanitarian Summit in Istanbul will consider a range of policy, technical and financial issues that may influence the direction of travel for humanitarian agencies in the future as they strive to meet the overall needs of affected populations more effectively. From that perspective, the draft evaluation report provides a timely reflection on the important question of the different responsibilities of UNHCR for refugees and internally displaced persons in particular.

4. By and large, UNHCR considers that the draft report has captured well the main operational implications of the organization's engagement with refugees under its mandate and how they differ from those implications which are applicable to internally displaced persons as part of the inter-agency effort developed in the context of the Inter-Agency Standing Committee under the leadership of the Emergency Relief Coordinator. It is pleased that the draft report has recognized the

efforts of UNHCR not only in responding successfully to the increase in the number of refugees requiring protection and assistance but also in largely upholding its specific responsibilities for internally displaced persons. UNHCR is further satisfied with the conclusion that meeting these dual obligations has not resulted in any observable negative consequences for either refugees or internally displaced persons. UNHCR notes that the report makes references to the measures taken in cooperation with the Office for the Coordination of Humanitarian Affairs, most prominently the joint note, to clarify how leadership and coordination mechanisms in mixed settings should function in practice.

5. UNHCR acknowledges the need to improve its data collection, monitoring and coverage of out-of-camp refugees and to strive to further strengthen the consistency of its feedback and communications with refugee populations. It also recognizes that specific coordination modalities may be required for particular country contexts. As such, UNHCR accepts the three recommendations proposed by OIOS. It has set out its proposed actions in the accompanying matrix.

6. Further comments and observations have been embedded in the text of the draft report accompanying the present memorandum. These serve principally to highlight points that are insufficiently clear or for which further precision or elucidation is required. That these are neither numerous nor contentious testifies to the exemplary cooperation that has characterized the conduct of the present evaluation since its inception.

7. I would like to take this opportunity to thank you and your colleagues, in particular the evaluation focal points, for the excellent cooperation provided.